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9
10 *Attorneys for Defendants*
11 *USA Boxing, Inc. and Michael McAtee*

12
13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

15 CITY BOXING CLUB, et al.,

16 Case No.: 2:23-cv-00708-JAD-DJA

17 Plaintiffs,

18 v.
19 **STIPULATION AND ORDER TO**
20 **EXTEND TIME TO RESPOND TO**
21 **AMENDED COMPLAINT**

22 USA BOXING, INC., et al.;

23 (FIRST REQUEST)

24 Defendants.

25 Pursuant to FRCP 6 and Local Rule IA 6-1, the parties, by and through their attorneys of record, stipulate as follows:

26 1. This is the first stipulation for extension of time to allow Defendants USA
27 Boxing, Inc. and Michael McAtee (the “USA Boxing Defendants”) to respond to the Amended
28 Complaint filed by Plaintiffs.

29 2. On May 5, 2023, Defendants Nationwide Mutual Insurance Company and
30 Scottsdale Insurance Company removed this action from the Eighth Judicial District Court for
31 Clark County, Nevada. *See* ECF No. 1.

32 3. Pursuant to FRCP 81(c), the USA Boxing Defendants’ response to the Amended
33 Complaint is now due on May 12, 2023.

34 4. The USA Boxing Defendants were seeking to retain Nevada counsel and has
35 recently retained the undersigned counsel. The USA Boxing Defendants and their counsel
36 require additional time to review the allegations and evaluate the case background to properly

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1 respond to the Amended Complaint. Therefore, the USA Boxing Defendants request an
2 additional twenty-one (21) days to prepare a response to the Amended Complaint (up to and
3 including June 2, 2023). Plaintiffs and the remaining defendants do not object.

4 5. This request for extension of time is not made for any improper purpose and will
5 not cause any undue delay. By making their appearance and this stipulation, the USA Boxing
6 Defendants do not waive any claims and defenses, including but not limited to personal
7 jurisdiction, failure to state a claim, and the other FRCP 12(b) bases.

8 DATED: May 12th 2023

9 PRICE & BECKSTROM

10 /s/ Daniel R. Price

11 Daniel R. Price, Esq. (SBN 13564)
12 Christopher Beckstrom (SBN 14031)
13 Janice J. Parker (SBN 14102)
14 Jasmin N. Stewart (SBN 16008)
15 1404 S. Jones Blvd.
16 Las Vegas, NV 89146
17 Attorneys for Plaintiffs

DATED: May 12th 2023

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/s/ Wing Yan Wong

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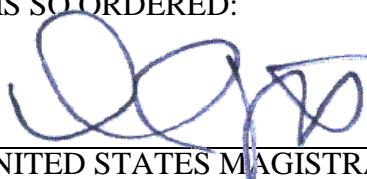
15 DATED: May 12th 2023

16 HINES HAMPTON PELANDA LLP

18 /s/ Christine M. Emanuelson

19 Christine M. Emanuelson, Esq. (SBN 10143)
20 Nicole M. Hampton, Esq. (SBN 16090)
21 400 S. 4th Street
22 Las Vegas, NV 89101
23 Attorneys for Defendants Nationwide Mutual
24 Insurance Company and Scottsdale Insurance
25 Company

26 IT IS SO ORDERED:

27 
28 UNITED STATES MAGISTRATE JUDGE

DATED: May 16, 2023

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